



Order Filed on January 16, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)
McGovern Legal Services, LLC
By: Marlena S. Diaz-Cobo, Esq.
850 Carolier Lane
North Brunswick, NJ 08902
(732) 246-1221
Attorneys for Sixty Acre Reserve Condominium
Association, Inc.

In Re:

MARIE CATHERINE SOSA

Case No.: 18-24035

Judge: Michael B. Kaplan

Chapter: 13

CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF

The relief set forth on the following pages, numbered one (1) through four (4) is hereby **ORDERED**.

DATED January 16, 2020

A handwritten signature of Michael B. Kaplan in black ink, written over a horizontal line.

Honorable Michael B. Kaplan
United States Bankruptcy Judge

McGOVERN LEGAL SERVICES, LLC
BY: MARLENA S. DIAZ-COBO, ESQ.
850 CAROLIER LANE
NORTH BRUNSWICK, NEW JERSEY 08902
(732) 246-1221
ATTORNEYS FOR SIXTY ACRE RESERVE CONDOMINIUM ASSOCIATION, INC.

In re:

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
IN PROCEEDINGS UNDER CHAPTER 13
OF THE BANKRUPTCY CODE

MARIE CATHERINE SOSA

CASE NO.: 18-24035-MBK

Debtor.

CONSENT ORDER

CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF

THIS MATTER having been brought before the court by McGovern Legal Services, LLC, attorneys for creditor, Sixty Acre Reserve Condominium Association, Inc. (the "Association"), by way of a Motion for Stay Relief and the parties having consented to the relief set forth herein, and for good cause shown and no cause to the contrary appearing;

IT IS ORDERED, ADJUDGED AND DECREED THAT the Debtor was indebted to the Association in the amount of \$2,599.00 in post-petition maintenance fees, late fees and attorneys' fees related to the Association's attempts to collect unpaid post-petition fees through December 9, 2019 (the "Total Due"). The Total Due is detailed below:

Maintenance Fees:	\$3,642.00
Late Fees:	\$150.00
Payments:	-\$2,732.00
<u>Legal (work related to post-petition default through 12/9/2019):</u>	<u>\$1,539.00</u>

Total:

\$2,599.00

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT the Debtor shall pay the Association \$940.00 on or before December 20, 2019.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT the Debtor shall pay the Association \$276.50 per month, commencing on February 1, 2020 and continuing until the Total Due is satisfied (the "monthly cure payment"). The monthly cure payment shall be paid by certified check made payable to Sixty Acre Reserve Condominium Association, Inc. and received by McGovern Legal Services, LLC, 850 Carolier Lane, North Brunswick, NJ 08902 on or before the first of each month until the Total Due is satisfied.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT the Debtor shall maintain post-petition assessments and other post-petition obligations as they become due and owing to the Association commencing on January 1, 2020; and


IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT if the Debtor fails to make the immediate payment specified above or fail to make any regular monthly payment or the additional monthly cure payment within thirty (30) days of the date the payments are due, then the Association may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtor's failure to comply with this order. At the time the Certification is filed with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtor, and the Debtor's attorney.

**WE HEREBY CONSENT TO THE FORM
AND ENTRY OF THIS CONSENT ORDER:**

McGovern Legal Services, LLC
Attorneys for Sixty Acre Reserve
Condominium Association, Inc.


MARLENA S. DIAZ-COBO, ESQ.

1/8/2020
DATE


WILLIAM H. OLIVER, JR., ESQ.
Attorney for Debtor

1/6/2020
DATE

Certificate of Notice Page 5 of 5

United States Bankruptcy Court
District of New Jersey

In re:
Marie Catherine Sosa
Debtor

Case No. 18-24035-MBK
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-3

User: admin
Form ID: pdf903

Page 1 of 1
Total Noticed: 1

Date Rcvd: Jan 17, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 19, 2020.

db +Marie Catherine Sosa, 208 Daisy Court, Jackson, NJ 08527-2583

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jan 19, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 17, 2020 at the address(es) listed below:

Albert Russo on behalf of Trustee Albert Russo docs@russotrustee.com
Albert Russo docs@russotrustee.com
Denise E. Carlon on behalf of Creditor MIDFIRST BANK dcarlon@kmlawgroup.com,
bkgroup@kmlawgroup.com
Marlena S. Diaz-Cobo on behalf of Creditor Sixty Acre Reserve Condominium Association, Inc.
collections@theassociationlawyers.com
Rebecca Ann Solarz on behalf of Creditor MIDFIRST BANK rsolarz@kmlawgroup.com
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov
William H. Oliver, Jr. on behalf of Debtor Marie Catherine Sosa woliver@oliverandlegg.com,
R59915@notify.bestcase.com

TOTAL: 7